IN THE UNITED STATES DISTRICT COURT WESTERN DISTRICT OF PENNSYLVANIA

WILLIAM GRIFFIS and T. ZENON PHARMACEUTICALS, LLC, d/b/a PHARMACY MATTERS,	; :
Plaintiffs,	Civil Action No.11-0263Judge Joy Flowers Conti
HIGHMARK BLUE CROSS BLUE SHIELD OF PENNSYLVANIA,	
Defendant.	: =
x	L., , , , , , , , , , , , , , , , , , ,

AFFIDAVIT OF JOHN P. FORGACH IN SUPPORT OF PLAINTIFF'S MOTION FOR ATTORNEYS' FEES AND COSTS AND INTEREST

STATE OF MARYLAND) ss.: COUNTY OF HOWARD)

JOHN P. FORGACH, under penalty of perjury, states:

- 1. I am currently the Senior Benefits Counsel of W.R. Grace & Co. My principle office in located in Columbia, Maryland. I submit this Declaration in support of the motion of Plaintiff William Griffis ("Plaintiff") for attorneys' fees. The opinions contained herein are strictly my own, and not those of W.R. Grace.
- 2. I am a native of West Mifflin, Pennsylvania. I graduated from Georgetown University in 1979 and received a J.D. (1982) and LLM (2003) from Georgetown University Law Center. I am member of the Pennsylvania and New York bars. I served as Law Clerk for three years to the Honorable Richard G. Zeleznik of the Pennsylvania Court of Common Pleas in Pittsburgh. I practiced law in Pittsburgh for

four years, and have on a daily basis since 1989 dealt with employee benefit and executive compensation issues, as well as issues regarding employment and labor law. One aspect of my work since 1991 has been the supervision of outside counsel handling those issues throughout the United States, including in Pennsylvania.

- 3. I have reviewed the rates charged by Paduano & Weintraub LLP in this case, as detailed in paragraph 3 of the Affidavit of Anthony Paduano, and I believe that such rates are entirely consistent with and not at all excessive compared to the charges for litigation of similar subject matters, size and complexity by attorneys with similar levels of experience.
- 4. I declare under penalty of perjury that the foregoing is true and correct.

Executed on the 12th day of December, 2011

John P. Forgach